

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
(Austin Division)

DANIEL BOSTIC,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:22-cv-158-RP
)	
THE DAILY DOT, LLC <i>et al.</i> ,)	
)	
Defendants.)	
)	

**PLAINTIFF DANIEL BOSTIC'S SUPPLEMENTAL RESPONSES TO
DEFENDANT DAILY DOT'S FIRST REQUESTS FOR PRODUCTION**

Plaintiff Daniel Bostic, by counsel, hereby submits the following supplemental responses to Defendant Daily Dot's First Set of Requests for Production.

REQUESTS FOR PRODUCTION

1. All documents created or exchanged between you and any other person. From November 1, 2020, through March 31, 2021, concerning the 2020 U.S. presidential election, the Stop the Steal movement, or any Stop the Steal Group.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, and not proportional to the needs of this case. Requiring Mr. Bostic to produce every document or communication regarding to the 2020 U.S. presidential election and/or the integrity of the ballot-counting process, in one of the most controversial and contested elections of our lifetimes, is extremely overbroad, invasive, and overly burdensome. Indeed, this kind of punishment for First Amendment protected speech

is exactly the kind of thing that Mr. Bostic is fighting against, given the ordeal he has suffered at the hands of Defendants for his First Amendment-protected activity of attending the January 6, 2021 rally at the Ellipse. This case is about Defendants' accusing Mr. Bostic of being an architect and organizer of violent riots on January 6, 2021, at the U.S. Capitol, and therefore, to the extent that Mr. Bostic possesses documents from the requested date range that references the events of January 6, 2021, at the U.S. Capitol, such documents will be produced. Also, because one of Defendants' apparent theories of defense relies on Mr. Bostic's affiliation with the organization Stop the Steal, Mr. Bostic will also produce any documents that relate to Stop the Steal.

Response: Without waiving objections, please see Bostic_000001–647, 784–916.

Supplemental Response: Additionally, please see Bostic_000919–53, 958–1158. To clarify Mr. Bostic's response, he included in his search the events of January 5, 2021, as Stop the Steal held an event that day. Given the extreme breadth of the request, it is very likely that Mr. Bostic has additional responsive documents, as the request would require every single correspondence with anyone "concerning the 2020 presidential election." Mr. Bostic declines to perform such a burdensome search.

2. All documents created or exchanged between you and any other person. From November 1, 2020, through April 30, 2021, concerning any event, rally, demonstration, or gathering of any type planned or promoted by or affiliated in any

way with any Stope the Steal Group.

Response: Please see Bostic_000001–647, 784–916.

Supplemental Response: Additionally, please see Bostic_000919–53, 958–1158.

3. All documents created or exchanged between you and any other person from November 1, 2020, through April 30, 2021, concerning any event, rally, demonstration, or gathering of any type planned or promoted by or affiliated in any way with any organization or group of any type that disputed the results of the 2020 U.S. presidential election or disputed the integrity of the ballot-counting process in any state during that election.

Response: Please see Bostic_000001–647, 784–916.

Supplemental Response: Additionally, please see Bostic_000919–53, 958–1158.

4. All documents concerning any activity or any sort that occurred in the Washington, D.C. area, from November 1, 2020, through April 30, 2021, concerning the 2020 U.S. presidential election.

Objection: Mr. Bostic objects to this request as vague, overly broad, and not reasonably related to the claims or defenses in this case. It is unclear what is meant by a “any activity of any sort . . . concerning the 2020 U.S. presidential election.” This request is both too vague and too broad to allow any meaningful response. There were

many activities in Washington, D.C. from November 1, 2020 to April 30, 2021 that “concerned” the 2020 election.

Supplemental Response: Mr. Bostic withdraws his objections pursuant to the agreed upon narrowing of scope as described in your letter of November 1, 2023. Please see Bostic_000006, 24–26, 54–62, 110–32, 272–81, 294, 349, 360–71, 390–404, 431–34, 558–63, 598–615, 623–28, 631, 784, 790, 794, 798, 802, 817–29, 834–59, 877–87, 920–24, 926, 930–33, 936–46, 970, 1096–97, 1106–13, 1118–21, 1130–31, 1302–07.

5. All documents exchanged between you and Ali Alexander from November 1, 2020, through January 31, 2021.

Response: Please see Bostic_000004–19; 63–647; 684–913.

Supplemental Response: Please see Bostic_953, 958–64, 966–97, 969–80, 985–97, 999–1003, 1008–18, 1022–23, 1029–43, 1045–52, 1055–70, 1086–87, 1090–97, 1104–13, 1118–21, 1130, 1137, 1139–47, 1156–58, 1219–49.

6. All documents exchanged between you and any email account with the “@viceandvictory.com” domain from November 1, 2020, through January 31, 2021.

Response: Please see Bostic_000294, 203–09, 331–647.

Supplemental Response: Please see Bostic_958, 961–64, 966–67, 970–80, 985–86, 993–97, 999–1003, 1018–19, 1029–43, 1045–46, 1055–60, 1065–66, 1086–87, 1090–93, 1096–97, 1104–13, 1118–21, 1130, 1137, 1139–47, 1156–58, 1219–49.

7. All documents concerning Vice and Victory created or exchanged from November 1, 2020, through January 31, 2021.

Response: Please see Bostic_000294, 302–09, 331–647.

Supplemental Response: Please see Bostic_958, 961–64, 966–67, 970–80, 985–86, 993–97, 999–1003, 1018–19, 1029–43, 1045–46, 1055–60, 1065–66, 1086–87, 1090–93, 1096–97, 1104–13, 1118–21, 1130, 1137, 1139–47, 1156–58, 1219–49.

8. All documents concerning A Political Firm, LLC created or exchanged from November 1, 2020, through January 31, 2021.

Response: No responsive documents within Mr. Bostic’s possession, custody, or control.

9. All documents you drafted, exchanged with any person, or received from any person from November 1, 2020, through January 31, 2021, containing any of the following terms, irrespective of capitalization and punctuation:

- ☐ Stop the Steal, #StoptheSteal, STS, #STS, stopthesteal.us, \$stopthestealus
- ☐ Wild Protest, wildprotest.com, #WildProtest
- ☐ DoNotCertify, Do Not Certify, #DoNotCertify
- ☐ JAN6, #JAN6, Jan 6, Jan. 6, Jan6th, #Jan6th, January 6.
- ☐ 86184
- ☐ Women for America First, WFAF
- ☐ One Nation Under God
- ☐ Moms for America
- ☐ Ellipse
- ☐ Freedom Plaza
- ☐ Area 8, Area 9, Area Eight, Area Nine
- ☐ Lot 8, Lot 9, Lot Eight, Lot Nine

- ☐ Plot 8, Plot 9, Plot Eight, Plot Nine
- ☐ Oath Keepers, Oathkeepers, Morelock, Meggs, OK Gator, Tom Burges, Tampa Tom, Kenneth Harrelson, Stewart Rhodes
- ☐ Proud Boys, PBs, Enrique Tarrio, Tarrio, Ethan Nordean, Joseph Biggs, Zachary Rehl

Response: Please see Bostic_000001–916.

Supplemental Response: Please see Bostic_917–1307.

10. All documents concerning any permit, sought on behalf of any person, to conduct any type of demonstration or event anywhere in the Washington, D.C. area from November 1, 2020, through January 31, 2021.

Response: No responsive documents within Mr. Bostic’s possession, custody, or control.

11. All documents concerning the “WH event” referred to in this exchange included in material Ali Alexander produced to the Select January 6th Committee (the “Silver Pass Exchange”).

Daniel Bostic	1/5/21 16:30	Incoming	Daniel Bostic	Jesse Binnall just asked if it,Äôs possible to get him into the WH event tomorrow. I figure he,Äöd be a good one to have there if possible. Nathan said I had to ask you.
Daniel Bostic	1/5/21 16:47	Outgoing		Ok he can have a silver pass
Daniel Bostic	1/5/21 16:49	Incoming	Daniel Bostic	Great Thankyou

Response: See Bostic_000610.

12. The full message string in which the message depicted in the above request appears.

Response: No responsive documents within Mr. Bostic’s possession, custody,

or control.

13. All documents concerning any “silver pass” of the type referred to in the Silver Pass Exchange or any “silver” wristbands or section relating to the “WH event” referred to in the Silver Pass Exchange or relating to any other activity that was planned or occurred on January 5, 2021, or January 6, 2021.

Response: No responsive documents within Mr. Bostic’s possession, custody, or control.

14. All documents concerning any “blue” passes, wristbands or section relating to the “WH event” referred to in the Silver Pass Exchange or relating to any other activity that was planned or occurred on January 5, 2021, or January 6, 2021.

Response: No responsive documents within Mr. Bostic’s possession, custody, or control.

15. The entire string of messages exchanged in any text-messaging group named, at any point from November 1, 2020, through January 31, 2021, as “STS,” “STS Management,” or “STS Patriots.”

Response: No responsive documents within Mr. Bostic’s possession, custody, or control.

16. The entire string of messages exchanged via text or in any messaging or

chat group that sent any messages concerning the 2020 U.S. presidential election, the integrity of the ballot-counting process in any state during that election, or any Stop the Steal Group.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims and defenses in this case, and not proportional to the needs of this case. Requiring Mr. Bostic to produce every message in any chat group that at any point referred to the 2020 U.S. presidential election and/or the integrity of the ballot-counting process, in one of the most controversial and contested elections of our lifetimes, is extremely overbroad and overly burdensome. This case is about Defendants' accusing Mr. Bostic of being an architect and organizer of violent riots on January 6, 2021, at the U.S. Capitol, and therefore, to the extent that Mr. Bostic possesses message strings with any chat groups that reference the events of January 6, 2021, at the U.S. Capitol, such messages will be produced. Also, because one of Defendants' apparent theories of defense relies on Mr. Bostic's affiliation with the organization Stop the Steal, Mr. Bostic will also produce any message strings that relate to Stop the Steal.

Response: Without waiving objections, please see Bostic_000063–293. Please note that many individual names and email addresses are partially redacted to protect their identities from doxxing. Mr. Bostic will produce an unredacted version upon entry of an appropriate protective order.

Supplemental Response: Subject to the agreed narrowing, as described in your letter of November 1, 2023, Mr. Bostic withdraws his objections, and has produced

unredacted copies of the previously produced documents. These text group chats are marked CONFIDENTIAL to protect the identities and contact information of the private volunteers to the STS organization from doxxing.

17. All documents concerning any person's or group of persons' transportation to or from any meeting, event, rally, or gathering of any type planned or held from November 1, 2020, through April 30, 2021, that concerned the 2020 U.S. presidential election, the integrity of the ballot-counting process in any state during that election, or any Stop the Steal Group.

Objection: Mr. Bostic objects to this request as vague and overly broad. It is unclear what is meant by "any meeting, event, rally, or gathering of any type . . . that concerned the 2020 U.S. presidential election". There were many events throughout the country from November 1, 2020 through April 30, 2021 that "concerned" the 2020 election. This request is both too vague and too broad to allow for any meaningful response. Mr. Bostic further objects that the request is not reasonably related to the claims or defenses in this case and is not proportional to the needs of this case, which concerns defamatory allegations that Mr. Bostic planned or organized the January 6, 2021 riots at the U.S. Capitol.

Response: Without waiving objections, please see Bostic_000020, 254, 294.

Supplemental Response: Mr. Bostic has not withheld any documents pursuant to objection and withdraws the objections to this request. Additionally, please see Bostic_000802, 817.

18. All documents concerning any person's or group of persons' transportation to or from any meeting, event, rally, or gathering of any type planned or held from November 1, 2020, through January 31, 2021, that concerned the 2020 U.S. presidential election, the integrity of the ballot-counting process in any state during that election, any Stop the Steal Group, or any other organization or group of any type that disputed the results of the 2020 U.S. presidential election or disputed the integrity of the ballot-counting process in any state during that election.

Objection: This request appears to be duplicative of Request No. 17. To the extent that it is different, Mr. Bostic objects to this request as vague and overly broad. It is unclear what is meant by "any meeting, event, rally, or gathering of any type . . . that concerned the 2020 U.S. presidential election". This request is both too vague and too broad to allow for any meaningful response. Mr. Bostic further objects that the request is not reasonably related to the claims or defenses in this case and not proportional to the needs of this case, which concerns defamatory allegations that Mr. Bostic planned or organized the January 6, 2021 riots at the U.S. Capitol.

Response: Without waiving objections, please see Bostic_000020, 254, 294.

Supplemental Response: Mr. Bostic withdraws his objections to this request, subject to the clarification provided in your letter dated November 1, 2023. Mr. Bostic does not have any additional responsive documents, nor had he withheld any pursuant to the prior objection. Additionally, please see Bostic_000802, 817.

19. All documents concerning any activity you engaged in, or interaction you had with any person, from and including January 5, 2021, through January 6, 2021.

Objection: Mr. Bostic objects to this request as vague, overly broad, unduly burdensome, not reasonably related to the claims and defenses in this case, and not proportional to the needs of this case. It is not clear what is meant by “any activity.” Moreover, this case is about false accusations by Defendants that Mr. Bostic was an architect or organizer of violent riots that occurred at the U.S. Capitol on January 6, 2021, and requiring him to document “any activity” or “interaction” is vastly overbroad. To the extent that he has documents relating to his activities or interactions on those two days that relate to the 2020 election, or to the events of January 6, 2021, Mr. Bostic will produce such documents.

Response: Without waiving objections, please see Bostic_000024–25; 61, 62; 615.

Supplemental Response: Additionally, please see Bostic_000834–58, 937–46, 1038, 1130–36, 1302–07. While Mr. Bostic maintains his objection to producing purely personal and private communications unrelated to STS, the election, or the events of January 5–6, 2021, he is not withholding any documents.

20. All documents concerning Stop the Steal LLC, Stop the Steal Political Action Committee, any other Stop the Steal Group, or any other organization or group of any type that disputed the results of the 2020 U.S. presidential election or disputed the integrity of the ballot-counting process in any state during that election.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, and not proportional to the needs of this case. All documents concerning Stop the Steal or any other group like them is exceedingly broad, especially since Mr. Bostic was an activist in the 2020 election cycle and a vocal supporter of election integrity and transparency. The claims and defenses in this case relate to January 6, 2021, not to all advocacy related to the 2020 election.

Response: Without waiving objections, please see Bostic_000001–916.

Supplemental Response: Additionally, please see Bostic_000917–1307. Mr. Bostic has not withheld any documents pursuant to objection and withdraws objections to this request.

21. All documents relating to any credit card or bank account(s) affiliated with or used by Stop the Steal LLC, Stop the Steal Political Action Committee, any other Stop the Steal Group, or any other organization or group of any type that disputed the results of the 2020 U.S. presidential election or disputed the integrity of the ballot-counting process in any state during that election, including but not limited to every monthly account statement.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, and not proportional to the needs of this case. All documents concerning Stop the Steal's financial information is exceedingly broad, and has nothing to do with the claims and

defenses in this case, which relate to January 6, 2021.

Response: Without waiving objections, please see Bostic_000476–83; 611; 617; 619; 643.

Supplemental Response: Additionally, please see Bostic_917, 1055, 1139. Mr. Bostic has not withheld any documents pursuant to objection.

22. All documents concerning any Donorbox, PayPal, Cash App, Venmo, or any other account payment-processing account or fundraising platform to which you had account access from November 1, 2020, through April 30, 2021.

Objection: Mr. Bostic objects to this request as vague, overly broad, unduly burdensome, and not proportionate to the needs of this case. As an initial matter, it appears that this request seeks every document, without any date-range limitation, pertaining to any payment processing account that he had access to during the stated date range. Therefore, this request would seek documentation dating from the inception of any such account, including Mr. Bostic's own, personal, and business accounts. Such a request is wildly overbroad, invasive, and burdensome. Moreover, Mr. Bostic's personal and business payment accounts have nothing to do with this lawsuit. Therefore, Mr. Bostic is withholding such documentation pursuant to objections. To the extent that this request can be narrowed to seek documents related to specific payment processing accounts, or to specific transactions, Mr. Bostic will revisit this request.

Supplemental Response: Subject to the agreed narrowing, as described in your

letter of November 1, 2023, Mr. Bostic withdraws his objections. Please see Bostic_000596–97, 620, 1105, 1146.

23. All documents reflecting any travel arrangements, and/or payment of same, for you to appear at any rally, event, or gathering of any type that was promoted as being affiliated in any way with any Stop the Steal Group or that otherwise concerned the 2020 U.S. presidential election or the integrity of the ballot-counting process in any state during that election.

Response: Please see Bostic_0000220, 254, 294, 523–24.

Supplemental Response: Please see Bostic_802.

24. All documents concerning any hotel you booked or that was booked for you in the Washington, D.C., area for any use by you or any other person from November 2020 through January 2021.

Response: Please see Bostic_000294, 400, 523–24.

25. All documents created or exchanged between you and any other person from November 1, 2020, through January 31, 2021, concerning any of the following hotels:

- ☐ Washington Marriott at Metro Center (775 12th Street, NW, Washington DC 20005);
- ☐ Holiday Inn Washington Capitol—National Mall (550 C Street, SW, Washington, DC 20024);
- ☐ Holiday Inn Alexandria at Carlyle (2460 Eisenhower Avenue, Alexandria, VA 22314); or

- Willard InterContinental Washington, D.C. (1401 Pennsylvania Avenue, NW, Washington DC 20004).

Response: No responsive documents within Mr. Bostic's possession, custody, or control.

26. All documents created or exchanged between you and any other person from November 1, 2020, through January 31, 2021, concerning any transportation or lodging booking codes concerning any Stop the Steal Group, including but not limited to RMP, STS, ST1.

Response: Please see Bostic_000294, 400, 523–24.

27. All documents concerning any payment you submitted or coordinated, or that was submitted on your behalf or at your direction, for any purchase or rental of any goods, services, or equipment concerning any event or gathering of any type that occurred at any time from November 1, 2020, through January 31, 2021, and that concerned the 2020 U.S. presidential election.

Response: Please see Bostic_000611–14.

28. All documents sent to, received by, or left in any draft folder of the email account daniel@stopthesteal.us or any other account with the @stopthesteal.us domain or any other domain related to or used by any Stop the Steal organization.

Response: Please see Bostic_000491; 525–26; 540–42; 546–51; 562–64; 587–92; 615.

Supplemental Response: Additionally, please see Bostic_000969–71, 987–92, 1022–23, 1027–28, 1044, 1047–54, 1061–64, 1066–72, 1082–85, 1088–89, 1094–95, 1101–03, 1105, 1131.

29. All account records, including but not limited to call logs, pertaining to any use of the phone number 202-515-8152 from. November 1, 2020, through April 30, 2021.

Response: No responsive documents within Mr. Bostic’s possession, custody, or control.

Supplemental Response: Mr. Bostic no longer holds this account, which is why he cannot access these records.

30. All documents concerning any of the websites <https://stopthesteal.us>, <https://wildprotest.com>, <https://donotcertify.com> or <https://marchtosaveamerica.com>.

Response: Please see Bostic_000063–859; 876–913.

Supplemental Response: Additionally, please see Bostic_000972–80, 993–94, 996–97, 1008–18, 1022, 1042–43, 1045–46, 1047–54, 1059, 1061–64, 1067–74, 1082–85, 1088–95, 1102, 1142–44, 1147.

31. All documents concerning any type of removal or deletion on or after January 6, 2021, of any of your social media posts from any platform.

Response: Please see Bostic_000687.

Supplemental Response: Additionally, please see Bostic_001302.

32. All documents concerning the Article, the Petrizzo Salon Article, or the Sollenberger Solan Article.

Objection: Mr. Bostic objects to the extent that this request would call for attorney-client privileged and work product material.

Response: Without waiving objections, please see Bostic_000001; 681–707.

Supplemental Response: Additionally, please see Bostic_001301–07. Pursuant to your limitation that this request does not include correspondence directly between Mr. Bostic and his attorneys in this matter, the objection is withdrawn and no documents have been withheld pursuant to privilege.

33. All documents concerning The Daily Dot, Zachary Petrizzo, or any person You believe or believed to be currently or previously affiliated with The Daily Dot.

Objection: Mr. Bostic objects to the extent that this request would call for attorney-client privileged and work product material.

Response: Without waiving objections, please see Bostic_000001; 681–707.

Supplemental Response: Additionally, please see Bostic_001301–07. Pursuant to your limitation that this request does not include correspondence directly between Mr. Bostic and his attorneys in this matter, the objection is withdrawn and no documents have been withheld pursuant to privilege.

34. All documents you provided to or received from Kashyap Patel. Or any website, organization, or representative affiliated with him in any way concerning your potential claims against Defendants.

Objection: Mr. Bostic objects to this request as vague, potentially calling for attorney-client privileged material, and not reasonably related to the claims or defenses in this case.

Response: Without waiving the above objection, please see Bostic_000648–76; 783.

Supplemental Response: Additionally, please see Bostic_000918, 1250–1300. No documents are withheld pursuant to privilege.

35. All documents you exchanged with or received from any person affiliated with the Chris Stigall Show, the Steak for Breakfast podcast, or any other media organization or program you have spoken to, concerning any appearance on those shows that referred or related to the Article, this action, your claims against Defendants, any Stop the Steal Group, or the 2020 U.S. presidential election.

Objection: Mr. Bostic objects to this request as not reasonably related to the claims or defenses in this case.

Response: Without waiving objections, no responsive documents within Mr. Bostic's possession, custody, or control.

36. All documents you exchanged with or received from Laura Sabatini from January 1, 2020, through the present concerning any therapy or psychiatric treatment you sought or received from her or anyone else.

Objection: Mr. Bostic objects to producing any responsive documents until entry of an appropriate protective order, pursuant to the psychotherapist-patient privilege.

Supplemental Response: Now that an agreed protective order has been submitted, Mr. Bostic withdraws his objection and is in the process of supplementing his document response with any responsive documents.

37. All documents concerning any mental health therapy or psychiatric treatment you received from January 1, 2020, through the present, including but not limited to any invoices or bills relating to such treatment.

Objection: Mr. Bostic objects to producing any responsive documents until entry of an appropriate protective order, pursuant to the psychotherapist-patient privilege.

Supplemental Response: Now that an agreed protective order has been submitted, Mr. Bostic withdraws his objection and is in the process of supplementing his document response with any responsive documents.

38. All documents concerning your potential, proposed, or actual appearance at any part of the Conservative Political Action Conference in any year

on or after 2020.

Response: Please see Bostic_000294–96.

Supplemental Response: Please see Bostic_001305.

39. All documents you exchanged with or received from any person concerning any effort to discuss or promote the documentary.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, and not proportional to the needs of this case.

Supplemental Response: Mr. Bostic stands on his objections, adding that he is subject to confidentiality and non-disclosure agreements with the production company that created the documentary. While it is highly likely that Mr. Bostic possesses responsive documents, given the extreme breadth of the request and his dedicated work as a producer on the documentary, he declines to engage in such an unlimited search. Moreover, Mr. Bostic's claimed damages have to do with his ability to promote the documentary at CPAC 2021 because of the benefit to him personally, not to the documentary. Mr. Bostic has searched for any communications or documents related to promoting the documentary at CPAC 2021 and could not find responsive documents.

40. All federal and state tax returns, including any attachments or accompanying schedules, you submitted for each tax year from 2018 through the

present.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, and not reasonably related to the claims or defenses in this case.

Supplemental Response: Mr. Bostic withdraws his objections and is in the process of producing any responsive documents.

41. All W-2s or Form 1099s you received each tax year from 2018 through the present.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, and not reasonably related to the claims or defenses in this case.

Supplemental Response: Mr. Bostic withdraws his objections and is in the process of producing any responsive documents.

42. All financial statements of and federal and state tax returns for AMDC LLC.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, and not proportional to the needs of this case.

Supplemental Response: Mr. Bostic stands on his objections and adds that he does not possess responsive documents.

43. All financial statements of and federal and state tax returns for Cystra

LLC, Cystra Ventures Ltd. Co., and any corporation, limited liability company, partnership, sole proprietorship, non-profit organization, or venture of any other type in which you have any type of financial or other interest.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, and not proportional to the needs of this case.

Supplemental Response: Mr. Bostic withdraws his objections and is in the process of producing any responsive documents.

44. All. Documents you contend support your claims against Defendants in any way.

Objection: Mr. Bostic objects to this request to the extent that it calls for the mental impressions and work product of counsel.

Response: Without waiving objections, please see Bostic_000001–916.

Supplemental Response: Please see Bostic_000917–1307. Pursuant to your limitation that this request does not include correspondence directly between Mr. Bostic and his attorneys in this matter and attorney work product, the objection is withdrawn and no documents have been withheld pursuant to privilege.

45. [none]

46. All images of any type, including but not limited to photographs and

video, depicting the events in the Washington, D.C. area on January 5, 2021, through January 6, 2021.

Objection: Mr. Bostic objects to this request as vague, overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, not proportional to the needs of this case, and that the requested documents are as easily obtainable by Defendants as they are by Plaintiff.

Response: To the extent that Mr. Bostic personally took photos or videos of the events in Washington, D.C. on January 5–6, 2021, he will produce any such documents that he still has.

Supplemental Response: Please see Bostic_000834–58, 936–46.

47. All phone records concerning any usage, from November 1, 2020, through January 31, 2021, of any cell phone or landline for which you are the account holder or to which you otherwise have lawful access.

Objection: Mr. Bostic objects to this request as overly broad, unduly burdensome, not reasonably related to the claims or defenses in this case, and not proportional to the needs of this case.

Response: Without waiving objections, no responsive documents within Mr. Bostic's possession, custody, or control.

Supplemental Response: Mr. Bostic withdraws objections to this Request, however, he is unable to produce responsive documents because he has changed cell phone carriers since January 31, 2021.

Dated: December 26, 2023

Respectfully Submitted,

/s/ Jason C. Greaves

Jason C. Greaves, TBN 24124953

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CERTIFICATE OF SERVICE

I certify that on December 26, 2023, a copy of the foregoing was delivered to counsel for Defendants by email.

/s/ Jason C. Greaves

Jason C. Greaves